Jake W. Peterson Attorney at Law 1215 West Hays Boise, Idaho 83702 Telephone: (208) 433-9882 Idaho State Bar No. 1675 U.S. DISTRICT COURT\_\_\_\_\_\_U.S. BANKRUPTCY COURT\_\_\_\_\_\_ DISTRICT OF IDAHO

APR 23 2003

LODGED \_\_\_\_\_ FILED \_\_\_\_

## UNITED STATES BANKRUPTCY COURT

DISTRICT OF IDAHO

In the matter of: )
Vincent Ray Tullock ) Case No. 00-00774
and Darci Joy )
Tullock, ) MOTION TO MODIFY DEBTORS'
CHAPTER 13 PLAN AND RELATED
MOTIONS AFTER CONFIRMATION AND
debtors. ) NOTICE OF HEARING

Comes now, the debtors above named, by and through Jake W. Peterson, attorney of record, and moves this Court for an order modifying the Chapter 13 Plan and Related Motions (Plan) of the debtors so that the remaining payments due and owing pursuant to the debtors' (Plan) can be paid in one lump sum by the debtors as soon as the debtors receive permission from this Court to make said payment. The debtors are refinancing their house to pay off the amount still due pursuant to their Plan. The attorney for the debtors requests that this Court further modify their Plan so that their attorney shall receive an additional \$150.00 as and for attorney fees and costs incurred in making this motion and that the debtors be order to pay to their trustee the sum of \$168.00. The trustee for the debtors has no objection to the debtors paying off their Plan early. debtors shall provide their trustee with copies of federal and state tax returns and refunds, if applicable, for the years during the term of the debtors' Plan.

## NOTICE OF HEARING

Please take notice that on the 19th day of May, 2003, at 1:30 p.m., or as soon thereafter as counsel can be heard,

at the U.S. Bankruptcy Court, 550 West Fort Street, Boise, Idaho Fifth floor, Courtroom Number 5, the above named debtors through their attorney will call up for hearing this motion.

Dated this 222 day of April, 2003.

Jake W. Peterson Attorney for the debtors.